

1 Steve W. Berman (*pro hac vice*)  
Robert F. Lopez (*pro hac vice*)  
2 Theodore Wojcik (*pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
3 1301 Second Avenue, Suite 2000  
Seattle, WA 98101  
4 Telephone: (206) 623-7292  
5 Facsimile: (206) 623-0594  
steve@hbsslaw.com  
6 robl@hbsslaw.com  
tedw@hbsslaw.com

7 Benjamin J. Siegel (SBN 256260)  
8 Ben M. Harrington (SBN 313877)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
9 715 Hearst Avenue, Suite 300  
Berkeley, CA 94710  
10 Telephone: (510) 725-3000  
11 Facsimile: (510) 725-3001  
bens@hbsslaw.com  
12 benh@hbsslaw.com

13 *Interim Lead Class Counsel*

14 [Additional Counsel Listed on Signature Page]

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 OAKLAND DIVISION

18 DONALD R. CAMERON, *et al.*,

19 Plaintiffs,

20 v.

21 APPLE INC.,

22 Defendant.  
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26  
27  
28

Case No. 4:19-cv-03074-YGR

**DEVELOPER PLAINTIFFS'  
RESPONSE TO SETTLEMENT  
CLASS MEMBER LETTERS (ECF  
NOS. 509 & 511)**

Hon. Yvonne Gonzalez Rogers

1 Developer Plaintiffs respectfully submit this this response to the letter filed by settlement  
2 class member Mad Otter Games, Inc. (ECF No. 509) and the joint letter filed by settlement class  
3 members aeioiwu LLC, Seabaa, Inc., LLC, SomaSim, LLC, and Trinket Studies, Inc. (ECF No. 511).  
4 The Settlement Administrator (“Angeion”) has confirmed to Class Counsel that each of these  
5 settlement class members either received and deposited its initial settlement check or has been issued  
6 a replacement. Angeion has provided the below details as to each claimant.

7 Mad Otter Games, Inc.’s letter indicates that it never received its initial settlement payment in  
8 an expected amount of \$40,324.41. *See* ECF No. 509 at 2. Angeion’s records indicate that a check  
9 in that amount was issued to Mad Otter Games, Inc. on December 20, 2022. After Mad Otter  
10 Games, Inc. reported to Angeion that it had not received the check, the check was reissued on  
11 February 17, 2023, and Angeion’s records indicate that it was deposited shortly thereafter. On  
12 January 26, 2024, Mad Otter Games, Inc. confirmed to Angeion that it had in fact received and  
13 deposited its settlement check.

14 Settlement class member aeioiwu LLC indicates that it has not received a settlement payment  
15 in an expected amount of \$5,264.99 and that, as successor to settlement class member Mikengreg  
16 LLC, it is entitled to an additional distribution in the amount of \$2,799.89. ECF No. 511 at 1.  
17 Angeion’s records indicate that on May 16, 2023 a settlement check in the amount of \$5,264.99 was  
18 issued to aeioiwu LLC and directed to an address aeioiwu LLC had provided. Angeion issued a  
19 replacement check to aeioiwu LLC on January 31, 2024. Angeion also issued a separate check to  
20 aeioiwu LLC in the amount of \$2,799.89 on January 31, 2024, after receiving documentation  
21 sufficient to confirm aeioiwu LLC’s ownership of Mikengreg LLC. Angeion has since contacted  
22 aeioiwu LLC and confirmed that it (aeioiwu LLC) received both settlement checks issued on January  
23 31, 2024.

1 Settlement class member Seabaa, Inc. indicates that it never received a settlement payment in  
2 an expected amount of \$20,162.20. ECF No. 511 at 1. Angeion's records indicate that on May 16,  
3 2023 a settlement check in that amount was issued to Seabaa, Inc. and directed to an address Seabaa,  
4 Inc. had provided. Angeion sent Seabaa, Inc. a replacement check on January 31, 2024. Angeion's  
5 records indicate that Seabaa, Inc.'s replacement check was delivered on February 6, 2024. Angeion  
6 has attempted numerous times to contact Seabaa, Inc. and confirm receipt. As of February 8, 2024,  
7 Angeion has not received a confirmation response.

8 Settlement class member SomaSim, LLC indicates that it has not received a settlement  
9 payment in an expected amount of \$6,048.66. ECF No. 511 at 2. Angeion's records indicate that a  
10 settlement check in that amount was issued to SomaSim, LLC on December 20, 2022 and directed to  
11 an address SomaSim, LLC had provided. Angeion issued a replacement check to SomaSim, LLC on  
12 August 25, 2023, and again on January 31, 2024. Angeion has confirmed with SomaSim, LLC that it  
13 received the replacement check issued January 31, 2024.

14 Settlement class member Trinket Studies, Inc. indicates that it has not received a settlement  
15 payment in an expected amount of \$6,048.66. ECF No. 511 at 2. Angeion's records indicate that a  
16 settlement check in that amount was issued to Trinket Studies, Inc. on October 18, 2022 and directed  
17 to an address Trinket Studies, Inc. had provided. Angeion issued replacement checks to Trinket  
18 Studies, Inc. on December 28, 2022, October 10, 2023, and January 31, 2024. Angeion has  
19 confirmed with Trinket Studies, Inc. that it received the replacement check issued January 31, 2024.

20 In sum, settlement checks have been issued and, in several instances reissued, to each of the  
21 foregoing settlement class members. With the exception of Seabaa, Inc., each class member has now  
22 confirmed receipt of their settlement payment. The correspondence Class Counsel has reviewed  
23 nevertheless indicates that the Settlement Administrator can improve its responsiveness to class  
24 member inquiries and more promptly reissue settlement checks as needed. Class Counsel continues  
25 to work with the Settlement Administrator to ensure this is accomplished throughout the remainder  
26 of the distribution period.

1 DATED: February 9, 2024

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO LLP

3 By /s/ Steve W. Berman  
4 STEVE W. BERMAN (*pro hac vice*)  
5 Robert F. Lopez (*pro hac vice*)  
6 Theodore Wojcik (*pro hac vice*)  
7 1301 Second Avenue, Suite 2000  
8 Seattle, WA 98101  
9 Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
robl@hbsslaw.com  
tedw@hbsslaw.com

10 Benjamin J. Siegel (SBN 260260)  
11 Ben M. Harrington (SBN 313877)  
12 HAGENS BERMAN SOBOL SHAPIRO LLP  
13 715 Hearst Avenue, Suite 300  
14 Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
bens@hbsslaw.com  
benh@hbsslaw.com

15 *Settlement Class Counsel*